

Application No. 10/551,022

### **REMARKS/ARGUMENTS**

The Office Action dated April 1, 2008 has been reviewed and carefully considered. Claims 1-13 are pending. Reconsideration of the above-identified application in light of the amendment and remarks is respectfully requested.

By means of the present amendment, claims 1-13 have been amended for non-statutory reasons, such as beginning the dependent claims with 'The' instead of 'A'. Claims 1-13 were not amended in order to address issues of patentability, and Applicants respectfully reserve all rights under the Doctrine of Equivalents.

In the Office Action, claims 1-2 and 8-9 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Young et al. (U.S. Patent Appl. Pub. 2001/0055008) in view of Aoki et al. (U.S. Patent No. 4,760389) and in further view of Cok et al. (U.S. Patent No. 6,320,325). It is respectfully submitted that claims 1-2 and 8-9 are patentable over Young, Aoki and Cok for at least the following reasons.

As indicated in the Office Action Young fails to disclose or suggest a further photosensitive element which is shielded from light emitted by the display element while being exposed to light from other directions, and which is connected to cancel photocurrents produced in the discharge photosensitive element by light from the other directions. The addition of Aoki and Cok fails to cure the infirmities of Young.

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The Office Action points to Cok and col. 2, lines 37-60; fig. 1 of Aoki to show these limitations. Applicants respectfully disagree.

As provided in the specification of the invention:

It has been recognized that the discharge photosensitive element in the known pixel circuit can respond to light input other than that intended from the EL display element, causing unnecessary discharging of the storage capacitor and consequently affecting detrimentally the performance of the pixel circuit in providing the desired compensation for aging effects. In the pixel of the invention, the further photosensitive element is used so as to counteract the effects of such unwanted light input to the discharge photosensitive element by being arranged to sense this unwanted light input and correct for the effects of such on the discharge photosensitive element in discharging the storage capacitor. This unwanted light input may be, for example, light entering the pixel concerned from the display elements of adjacent pixels as a form of optical cross-talk, or light entering the pixel from external sources, notably ambient light.

The invention offers the additional advantage that the operation of the further photosensitive element can be effective as well in counteracting the effects of leakage currents which may occur in the discharge photosensitive element and also contribute to a degradation in the performance of the known pixel circuit.

In particular, Aoki on col. 2, lines 37-60 provides an ambient light detector for detecting the intensity of ambient light incident on the display surface of the transmitting type display panel, and a brightness controller for controlling the light source according to the detection output of the ambient light detector such that the intensity of light from the light source to the transmitting type display panel is increased with an increase of the detected light intensity. Thus, Aoki simply teaches an ambient light detector for the purpose of increasing the intensity of light for a display panel. This in no way discloses a further photosensitive element which is shielded from light emitted by the display

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element while being exposed to light from other directions, and which is connected to cancel photocurrents produced in the discharge photosensitive element by light from the other directions, as in independent claim 1.

It is respectfully submitted that in order to establish a *prima facie* case of obviousness, three basic criteria must be met;

1. there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or combine the reference teachings;
2. there must be a reasonable expectation of success; and
3. the prior art reference must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)

Having shown that Young, Aoki and Cok, alone or in combination, fail to disclose each and every element claimed, applicant submits that the reason for the Examiner's rejection of claim 1 has been overcome and can no longer be sustained. Applicant respectfully requests reconsideration, withdrawal of the rejection and allowance of claim 1.

In the Office Action, claims 3-7 and 10 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Young et al. in view of Aoki et al. in view of Cok et al. and in further view of Knapp et al (U.S. Patent No. 5,838,308). Claims 11-13 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Young et al. in view of Aoki et

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al. in view of Cok et al. and in further view of Sato et al (U.S. Patent Appl. Pub. 2004/0017162).

With regard to the dependent claims 2-13 these claims ultimately depend from one of the independent claim 1, which has been shown to be allowable in view of the cited references. Accordingly, claims 2-13 are also allowable by virtue of their dependence from an allowable base claim.

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

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